

1 Douglas J. Dixon, State Bar No. 275389
ddixon@hueston.com
2 HUESTON HENNIGAN LLP
620 Newport Center Drive, Suite 1300
3 Newport Beach, CA 92660
Telephone: (949) 229-8640
4 Facsimile: (888) 775-0898

5 Jonathan Kanter, D.C. Bar No. 473286
(admitted pro hac vice)
6 jonathan@kanterlawgroup.com
Brandon Kressin, D.C. Bar. No. 1002008
7 (admitted pro hac vice)
brandon@kanterlawgroup.com
8 THE KANTER LAW GROUP, PLLC
1717 K Street N.W., #900
9 Washington, D.C. 20006
Telephone: (202) 792-3037
10
11 Attorney for Third-Party Respondent
Yoga Buddhi Co.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14

15 EPIC GAMES, INC.,
16 Plaintiff and Counter-Defendant,
17 vs.
18 APPLE INC.,
19 Defendant and Counterclaimant.

Case No. 4:20-cv-05640-YGR
Case No. 4:11-cv-06714-YGR
Case No. 4:19-cv-03074-YGR

**DECLARATION OF DOUGLAS J. DIXON
PURSUANT TO CIVIL LOCAL RULE 7-
11(a) IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL DOCUMENTS AT
TRIAL PURSUANT TO CIVIL LOCAL
RULE 79-5(e)**

20 IN RE APPLE iPHONE ANTITRUST
21 LITIGATION

22 DONALD R. CAMERON, et al.,
23 Plaintiffs,
24 vs.
25 APPLE INC.,
26 Defendant.

DECLARATION OF DOUGLAS J. DIXON

I, Douglas J. Dixon, declare as follows:

3 1. I am a partner with the law firm of Hueston Hennigan LLP, counsel of record for
4 Yoga Buddhi Co. (“Yoga Buddhi”) in this action. I am an attorney duly licensed to practice before
5 the courts in the State of California. I submit this declaration in support of Yoga Buddhi’s
6 concurrently filed Motion to Seal Documents pursuant to Civil Local Rule 79-5(e). I have personal
7 knowledge of the facts set forth in this Declaration except as stated otherwise, and if called as a
8 witness, I could and would testify competently to such facts under oath.

9 2. On April 23, 2021, counsel for Epic informed Yoga Buddhi that Epic had included
10 documents produced by Yoga Buddhi and designated as confidential on its exhibit list for trial.
11 Epic requested that Yoga Buddhi file the present motion to seal and indicated that Epic would file
12 separate objections, if any. Yoga Buddhi has worked diligently to identify which of its confidential
13 materials satisfy the “compelling reasons” standard for sealing and to narrow its sealing request to
14 the minimum amount necessary to protect the personally identifying information of Yoga Buddhi’s
15 individual users as well as Yoga Buddhi’s confidential and proprietary business information.

16 3. I declare under penalty of perjury of the laws of the United States of America that the
17 foregoing is true and correct. This declaration was executed this 29th day of April 2021, in
18 Marshall, Texas.

DOUGLAS J. DIXON